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Attorney for Defendants:

STATE OF NEW JERSEY, THE DIVISION
OF CHILD PLACEMENT AND PROTECTION,
KYLE HIGGINS, MARY LIPPENCOT, KATIE
EPPERLY, AND JANELLE CLARK.

By: Shmuel Bushwick
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MICHAEL LASCHE and JENNIFER
LASCHE,

Plaintiffs,

v.

STATE OF NEW JERSEY, THE
DIVISION OF CHILD PROTECTION AND
PERMANENCY, KYLE HIGGINS
PERSONALLY AND IN HER OFFICIAL
CAPACITY; KATIE EPPERLY,
PERSONALLY AND IN HER OFFICIAL
CAPACITY; MARY LIPPENCOT,
PERSONALLY AND IN HER OFFICIAL
CAPACITY; JANELLE CLARK,
PERSONALLY AND IN HER OFFICIAL
CAPACITY, AND JOHN OR JANE DOES
1 THOUGH 10 PERSONALLY AND IN
THEIR OFFICIAL CAPACITY
DEPARTMENT,
Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF
NEW JERSEY
VICINAGE OF TRENTON**

HON. _____,
U.S.D.J.

CIVIL ACTION NO. _____

NOTICE OF REMOVAL

**TO THE CHIEF JUDGE AND JUDGES OF THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF NEW JERSEY:**

This Notice of Removal having been opened to the Court by

counsel Gurbir S. Grewal, Attorney General of New Jersey, Deputy Attorney General Shmuel Bushwick appearing on behalf of Defendants the State of New Jersey, the Division of Child Placement and Protection, Kyle Higgins, Mary Lippencot, Katie Epperly, and Janelle Clarks (the "State Defendants"), in accordance with the provisions of 28 U.S.C. § 1446 respectfully show that:

1. The State Defendants are defendants in a civil action brought in the Superior Court of New Jersey, Law Division, Monmouth County, entitled: *Lasche, et al., v. State of New Jersey, et al.*, bearing Monmouth County Docket Number MON-L-004157-18.

2. The United States District Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331.

3. This action is removable to the District Court pursuant to 28 U.S.C. § 1441(a).

4. The Summons and Complaint, filed with the Superior Court of New Jersey, Law Division, Monmouth County, on or about November 19, 2018, a copy of which was served upon Defendant Katie Epperly on or about November 29, 2018, constitutes the first notice to the State Defendants, that the Plaintiffs Michael and Jennifer Lasche, were asserting federal claims which would permit removal to federal court.

5. The Complaint specifically mentions 42 U.S.C. § 1983

and 42 U.S.C. § 1985, and asserts federal constitutional claims, including under the First and Fourteenth Amendments.

6. This Notice of Removal is timely filed, pursuant to 28 U.S.C. § 1446(b)(1) and (3), allowing the State Defendants to remove, pursuant to 28 U.S.C. § 1331, on the basis of federal question jurisdiction, since it is filed within thirty (30) days of receipt by counsel for the State Defendant of a copy of the Summons and Complaint.

WHEREFORE, the State Defendants respectfully request that the action now pending in the Superior Court of New Jersey, Law Division, Monmouth County, entitled *Lasche, et al., v. State of New Jersey, et al.*, bearing Monmouth County Docket Number MON-L-004157-18 be removed to this Court.

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Shmuel Bushwick
Shmuel Bushwick
Deputy Attorney General
NJ Attorney ID: 073832013

DATED: December 24, 2018